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and ON CHAIN INNOVATIONS, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

HIDDEN EMPIRE HOLDINGS, LLC;
a Delaware limited liability company;
HYPER ENGINE, LLC; a California
limited liability company; DEON
TAYLOR, an individual,

Plaintiffs,

v.

DARRICK ANGELONE, an
individual; AONE CREATIVE, LLC
formerly known as AONE
ENTERTAINMENT LLC, a Florida
limited liability company; ON CHAIN
INNOVATIONS, LLC, a Florida
limited liability company,

Defendants.

Case No. 2:22-cv-06515-MWF-AGR
Action Filed: September 12, 2022

Assigned to Honorable
Judge Michael W. Fitzgerald

**DECLARATION OF SANDRA
CALIN IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT**

DATE: August 18, 2025
TIME: 10:00am
DEPT: 5A

[Filed Concurrently with Defendants'
Memorandum of Points and Authorities in
Opposition to Plaintiffs' Motion for Summary
Judgment; Declaration of Defendant Darrick
Angelone in Opposition to Plaintiffs' Motion
for Summary Judgment; Declaration of Rick
Watts in Opposition to Plaintiffs' Motion for
Summary Judgment]

I, Sandra Calin, declare as follows:

1. I am an attorney at law duly licensed to practice before all courts of the
State of California and am a partner with the law firm of Kramer, deBoer & Keane,
LLP, attorneys of record for Defendants DARRICK ANGELONE, AONE

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1 CREATIVE, LLC and ON CHAIN INNOVATIONS, LLC (“Defendants”) in the
2 above-captioned case.

3 2. I have personal knowledge of the following facts and, if called upon as
4 a witness, could competently testify thereto, except as to those matters which are
5 explicitly set forth as based upon my information and belief and, as to such matters, I
6 am informed and believe that they are true and correct.

7 3. This Declaration is submitted in support of Defendants’ Opposition to
8 Plaintiffs’ Motion for Summary Judgment.

9 4. The Declaration of Felton T. Newell in support of the Motion states that
10 a “meet and confer telephone conference” took place on May 1, 2025. This was more
11 than 30 days prior to the filing of the Motion for Summary Judgment, and the
12 telephone conference did not discuss the specific grounds for the Motion. The
13 conversation was a general conversation in which Mr. Newell indicated that he
14 intended to file Motion for Summary Judgment. The conversation did not discuss
15 thoroughly “the substance of the contemplated motion and any potential resolution”
16 as required by this Court’s Local Rule 7-3.

17 5. Following a Status Conference held on April 2, 2024, I participated in a
18 telephone conference with Erin Burke of FTI, counsel for Plaintiffs Stephanie Jones
19 Nojima, and Sean Merrick, regarding transfer of four of the “Icelandic domains” that
20 are at issue in this litigation.

21 6. During the telephone conference, Mr. Merrick was provided with the
22 names used by Roxanne Taylor to register the domains, and the domains were
23 transferred to her by Mr. Merrick. Following the telephone conference, Ms. Nojima
24 confirmed by email that the domains had been transferred.

25 7. During the hearing on April 2, 2024, counsel for Plaintiffs Lawrence
26 Hinkle confirmed that of the total of nine of the “Icelandic domains,” five were in fact
27 unregistered and in the public domain, and Ms. Taylor was able to register them. With
28 the transfer of the remaining four domains by Mr. Merrick, all nine of the domains

1 have been accounted for, and the terms of the Preliminary Injunctions with respect to
2 these nine domains have been satisfied.

3 I certify under penalty of perjury that the foregoing is true and correct.

4 Executed this 4th day of August, 2025, at Calabasas, California.

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SANDRA CALIN, Declarant

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CERTIFICATE OF SERVICE

I am employed in Los Angeles County, California. I am over the age of 18 and not a party to this action; my business address is 27001 Agoura Road, Suite 350, Calabasas, CA 91301. My email address is ynelson@kdeklaw.com.

I certify that on August 4, 2025, I served: **DECLARATION OF SANDRA CALIN IN SUPPORT OF DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT** on the following parties or counsel of record as follows:

Felton T. Newell, Esq. Newell Law Group PC 1801 Century Park East, 24 th Floor Phone (310) 556-9663 E-mail: felton@newellpc.com ; christine@newellpc.com	<i>Counsel for Plaintiffs</i>
Justin Kian, Esq. J.T. Fox, Esq. LAW OFFICES OF JT FOX, APC 556 S. Fair Oaks Avenue, Suite 444 Pasadena, California 91105 Telephone: (888) 750-5530 - Fax: (888) 750-5530 Email: jt@jtfoxlaw.com ; justin@jtfoxlaw.com	<i>Co-Counsel for Defendants</i>

By ECF/CM: I electronically filed an accurate copy using the Court's Electronic Court Filing ("ECF") System and service was completed by electronic means by transmittal of a Notice of Electronic Filing on the registered participants of the ECF System.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct. Executed at Calabasas, California on August 4, 2025.

/s/ Yolanda Nelson
Yolanda Nelson